

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

SHERIF AHMED ABOUL-MAGD,

Plaintiff,

v.

EMILY TAYLOR, DANIEL ERWIN, and

BUCHANAN, WILLIAMS & O'BRIEN, P.C.,

Defendants.

Case No. 3:25-cv-05015-BCW

[PROPOSED] TEMPORARY RESTRAINING ORDER

Before the Court is Plaintiff's Emergency Motion for Temporary Restraining Order (Doc. 17), filed pursuant to Rule 65 of the Federal Rules of Civil Procedure.

Upon review of the motion, accompanying declarations and exhibits, and the absence of any timely opposition or rebuttal demonstrating otherwise, the Court finds:

1. Plaintiff has demonstrated a likelihood of success on the merits of his claims under 42 U.S.C. §§ 1983 and 1985, including allegations of retaliation, denial of due process, and coordinated legal harm by named Defendants;
2. Plaintiff has shown he will suffer immediate and irreparable harm in the absence of temporary injunctive relief, including the threat of warrantless home intrusion, compelled psychological evaluation, suppression of parental rights, and a pending retaliatory criminal prosecution;
3. The balance of equities tips in Plaintiff's favor, as the harm he faces significantly outweighs any asserted interest of the Defendants in continuing enforcement of state orders challenged as unconstitutional;
4. The public interest favors the protection of constitutional rights, due process, and fair adjudication in the face of alleged systemic misconduct;

Accordingly, and pursuant to Fed. R. Civ. P. 65(b), the Court hereby ORDERS as follows:

IT IS ORDERED THAT:

1. The enforcement of any state court order entered on or after May 6, 2025, in Case No. 24AP-FC00260 (Jasper County), imposing the following conditions is hereby STAYED for 14 days from the date of this Order:
 - o Any compelled mental health or psychological evaluation of Plaintiff;
 - o Any provision authorizing or directing search or entry into Plaintiff's home without a valid warrant;
 - o Any restriction on Plaintiff's access to court filings, records, or communications directly tied to the federal civil rights claims before this Court.
2. The criminal hearing scheduled for June 2, 2025, in Missouri Case No. 25AO-CR00345, is hereby temporarily enjoined from proceeding, to the extent that the charge arises from conduct directly connected to Plaintiff's exercise of federally protected rights under the First and Fourteenth Amendments and the ongoing federal litigation.
3. Defendants shall appear before this Court on [insert hearing date – typically within 14 days], to show cause why a preliminary injunction should not be entered in this matter.
4. Plaintiff is granted leave to submit additional sworn declarations or sealed evidence in advance of the hearing.
5. This Order shall take effect immediately and remain in force for 14 days, unless extended by further Order of the Court.

SO ORDERED.

Dated: _____

Kansas City, Missouri

Hon. Brian C. Wimes

United States District Judge